

EXHIBIT 4

From: Edward ReBrook, ESQ
Sent: Thursday, May 28, 2020 5:08 PM
To: CommanderBurt
Cc: Acacia Dietz
Subject: Motion to Withdraw Denied

Burt:

My motion to withdraw as counsel for NSM and NF was rejected by Judge Hoppe. As such, I am still the NSM's attorney for *Sines v. Kessler*. Again, I must urge you to provide the following information:

- The names, titles, addresses, and phone numbers of all of NSM's officers.
- The names/passwords to any websites, chat rooms, or other electronic mediums by which the group has communicated.
- any electronic devices with discoverable information, including officers' cell phones and computers and any cell phones/computers owned by the NSM.

Ms. Dietz can coordinate with you regarding the process of turning over equipment to the vendor for imaging. But this must be done ASAP. I realize the inconvenience that this must cause, but as I've said from the beginning to Mr. Schoep, if there was never a conspiracy to incite violence, then there is nothing to fear by turning over the information.

In any case, I have been ordered to get this discoverable information from you; therefore, you are also being ordered by the court to cooperate. Please discuss with Ms. Dietz and come up with a plan to get this all to the Vendor by next week.

Trial is scheduled for October. Since I believe that plaintiff's are grasping at straws to make their case, I suspect we will prevail at litigation.

Best regards,

W. EDWARD REBROOK, IV
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From: CommanderColucci
Sent: Thursday, October 22, 2020 1:41 AM
To: Acacia Dietz
Subject: Re: custodians

Hi Acacia,

I have questioned all of the current members I could reach. The ones I did question regarding Charlottesville stated they didn't even know what the NSM or Charlottesville was at that time. As for the very few members that continued to be active after the NSM Florida was incorporated, they find themselves in the same situation as myself. They state that they have never been to Charlottesville in their lives and have no responsive documents pertaining to Unite the Right. As for me, contrary to what the Plaintiff's claim, I have surrendered every account credential, electronic device(s) and bit of information I have. I've even submitted to forensic analysis' of my electronic devices, in which I have no idea how you would hide or delete anything with those types of tests. Since I have never been to Charlottesville in my life either, nor was I a member of the NSM at that time, it is impossible for me to have an responsive documents or information. If the Plaintiff's would further claim it was forwarded to me after the fact, I would gladly go on the record and state that is a lie.

Regards,



Commander Burt Colucci

Democracy is talking itself to death. The people do not know what they want; they do not know what is the best for them. There is too much foolishness, too much lost motion. I have stopped the talk and the nonsense. I am a man of action. Democracy is beautiful in theory; in practice it is a fallacy. You in America will see that some day.-Benito Mussolini

National Socialist Movement

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----- Original Message -----

On Thursday, October 22, 2020 1:02 AM, Acacia Dietz <acacia.dietz@outlook.com> wrote:

Acacia Dietz

Legal Assistant

The ReBrook Law Office

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Email: acacia.dietz@outlook.com

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From: Acacia Dietz
Sent: Wednesday, October 21, 2020 12:03 AM
To: CommanderColucci
Cc: ESQ Edward ReBrook
Subject: RE: Logins

Burt –

Do you have any updated information regarding any additional custodians for NSM email or social media accts etc?

As representation for the NSM it is our duty to make sure every attempt has been made to acquire the information (custodians, accts, etc) needed for a complete discovery process. I realize counsel for the has asked this before with no response, however, an answer is required to bring before the court on this matter.

Acacia Dietz

Legal Assistant

The ReBrook Law Office

Phone: 586.696.0385

Email: acacia.dietz@outlook.com

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From: [CommanderColucci](#)
Sent: Tuesday, October 20, 2020 11:51 PM
To: [Acacia Dietz](#)
Subject: Logins